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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Administration of the) DA 91-1307
North American)
Numbering Plan)

REPLY COMMENTS

U S WEST Communications, Inc. ("U S WEST"),¹ through counsel, replies to comments filed in response to the National Association of Regulatory Utility Commissioners' ("NARUC") Petition.² In its Petition, NARUC requests that the Federal Communications Commission ("Commission") initiate a Notice of Inquiry ("NOI") on numerous issues associated with the administration of the North American Numbering Plan ("NANP").

I. INTRODUCTION

Twenty-five parties filed comments on NARUC's Petition.³ A large number of those parties supported NARUC's

¹U S WEST is a common carrier provider of exchange access and exchange telecommunications services.

²Petition for Notice of Inquiry Addressing Administration of the North American Numbering Plan, filed Sept. 26, 1991 ("Petition"). See Public Notice, 6 FCC Rcd. 6070 (1991).

³Ameritech Operating Companies ("Ameritech"); BellSouth Corporation ("BellSouth"); NYNEX Telephone Companies ("NYNEX"); Pacific Bell and Nevada Bell ("Pacific"); Southwestern Bell Telephone Company ("SWBT"); Centel Corporation ("Centel"); GTE Service Corporation ("GTE"); Rochester Telephone Corporation ("RTC"); United Telecommunications, Inc. ("UTI"); Metropolitan Fiber Systems, Inc. ("MFS"); Teleport Communications Group ("TCG"); Allnet Communication Services, Inc. ("Allnet"); American
(continued...)

request for a NOI.⁴ All cellular providers, interexchange carriers ("IXC"), competitive access providers ("CAP") and public utility commissions filing comments supported the establishment of a NOI. Of greater interest is that more local exchange carriers ("LEC") supported NARUC's Petition than opposed it. Comments ranged from general support for a NOI on numbering issues to discussions of specific numbering issues which should be addressed in a NOI.

Conversely, many parties expressed very strong reservations about including numbering issues such as Carrier Identification Code ("CIC") expansion and Interchangeable Numbering Plan Area ("INPA") codes in a NOI.⁵ The primary reason behind these reservations was the fear that implementation work

³(...continued)

Telephone and Telegraph Company ("AT&T"); MCI Communications Corporation ("MCI"); Unitel Communications Inc. ("Unitel"); McCaw Cellular Communications, Inc. ("McCaw"); Rogers Cantel Inc. ("Cantel"); Public Service Commission of the District of Columbia ("D.C. PSC"); Florida Public Service Commission ("FPSC"); National Telephone Cooperative Association ("NTCA"); Telocator; United States Telephone Association ("USTA"); Bell Communications Research, Inc. ("Bellcore"); Telecom Canada; and U S WEST.

⁴Eighteen parties took the position that the Commission should institute a NOI in the near future. See, e.g., Comments of FPSC; Comments of MFS; Comments of NTCA; Comments of AT&T. U S WEST did not find a NOI to be necessary and urged the Commission to deny NARUC's Petition. See Comments of U S WEST at 2-6.

⁵While supporting the establishment of a NOI on numbering, NYNEX urged the Commission to exclude issues such as INPAs and CIC expansion. See Comments of NYNEX at 4-7. NYNEX's belief was that the industry had already achieved consensus on these issues and including them in a NOI might delay implementation. See id. Ameritech expressed similar reservations on CIC expansion and INPAs in opposing the commencement of a NOI. Comments of Ameritech at 5-10.

on critical numbering projects/issues would grind to a halt pending the outcome of any Commission proceeding.

With one exception, there was little agreement among the supporters of a NOI as to what issues/topics should and should not be addressed in a NOI. The one issue which most supporters of a NOI agreed on -- was the need to address Bellcore's role as NANP administrator. Many parties expressed general concerns with respect to how Bellcore performs its role as NANP administrator. Some parties complained of Bellcore's "wireline bias,"⁶ while others argued that Bellcore favors the interests of its owners (i.e., the Regional Bell Operating Companies).⁷

II. THE ONLY ISSUE APPROPRIATE FOR A NOI AT THE PRESENT TIME IS THAT OF BELLCORE'S ROLE AS NANP ADMINISTRATOR

After a review of the comments on NARUC's Petition, U S WEST is of the opinion that there would be value in initiating a NOI to address one issue -- Bellcore's role as NANP administrator. If nothing else, it would give the Commission an opportunity to scrutinize Bellcore's role as administrator and to consider alternative ways in which Bellcore, or some other entity, might administer the NANP.⁸

⁶E.g., Comments of McCaw at 10-12; Comments of Telocator at 3-9.

⁷See, e.g., Comments of MCI at 5; Comments of MFS at 5-8.

⁸U S WEST's support for such a limited NOI is in no way a criticism of Bellcore's performance as NANP administrator.

III. THE COMMISSION SHOULD NOT ADDRESS SPECIFIC
NUMBERING ISSUES IN A NOI

In its comments, U S WEST noted that industry and standards bodies had addressed, or are currently addressing, many of the specific numbering issues which NARUC raised in its Petition.⁹ U S WEST argued that no new information would be elicited by a NOI and pointed out that industry and standards bodies were open to all interested parties.¹⁰ Other parties argued that a NOI addressing specific numbering issues would be counterproductive in that it would introduce uncertainty and delay industry implementation efforts.¹¹

U S WEST also argued that a notice and comment proceeding was not an appropriate vehicle to address complex numbering issues.¹² U S WEST urged the Commission to employ negotiated rulemaking ("NRM") procedures or to establish an advisory committee if the Commission found that its direct involvement was required to protect the public interest.¹³ No commenting party has presented any evidence or logic which convinces U S WEST that it should alter its belief that the use

⁹Comments of U S WEST at 2-5.

¹⁰Id. at 4-5.

¹¹See, e.g., Comments of Ameritech at 1-3; Comments of NYNEX at 2-6.

¹²Comments of U S WEST at 4-6.

¹³Id. at 5-6.

of NRM procedures or the creation of an Advisory Committee would be a much more effective means of developing workable numbering rules, if the Commission finds such rules are necessary. As such, the Commission should refrain from addressing any specific numbering issues in a NOI and should restrict any NOI to the role of Bellcore as NANP administrator.

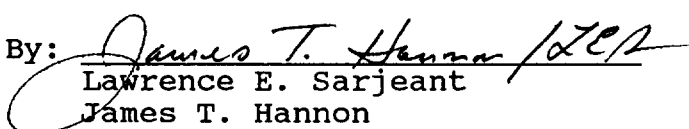
IV. CONCLUSION

The Commission should grant NARUC's Petition to the extent discussed above and limit any NOI solely to addressing the issue of Bellcore's role as NANP administrator.

Respectfully submitted,

U S WEST Communications, Inc.

By:

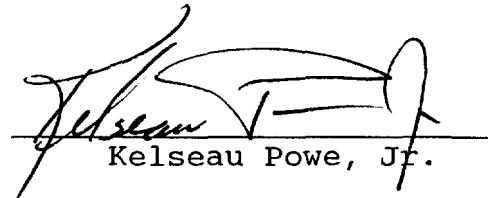

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January 17, 1992

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify on this 17th day of January, 1992, that I have caused a copy of the foregoing **REPLY COMMENTS** to be served via United States first class mail, postage prepaid, to the persons named on the attached service list.


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